

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:) CHAPTER 11
) CASE NO. 18-66879
COUNTRY CLUB, INC.)
)
Debtor,)
)

**MOTION FOR EXPEDITED HEARING
ON THE FOLLOWING FIRST DAY MOTION**

- 1) DEBTOR'S EMERGENCY MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO (A) MAINTAIN EXISTING BANK ACCOUNTS AND CASH MANAGEMENT SYSTEM AND (B) CONTINUE USE OF EXISTING BUSINESS FORMS**

COMES NOW, Country Club, Inc. ("Debtor"), and brings this Motion for Expedited Hearing pursuant to Rule 9013-4, Bankruptcy Local Rules for the Northern District of Georgia, and respectfully shows the Court as follows:

1.

The Debtor filed its petition for relief pursuant to Chapter 11, Title 11, of the United States Code on October 5, 2018 (the "Petition Date").

2.

On and after the Petition Date, the Debtor filed Emergency Motion For An Order Authorizing The Debtor To (A) Maintain Existing Bank Accounts And Cash Management System And (B) Continue Use Of Existing Business Forms [Docket No.] (collectively the "Motions").

3.

The Motions must be heard on an expedited basis in order to secured legal representation in this Chapter 11 case, to continue operation of the Debtor's business, to prevent loss of employees, and to avoid significant disruption of business.

WHEREFORE, Debtor respectfully requests this Court:

- a) Schedule an expedited hearing on the above-designated Motions; and
- b) Grant such other and further relief as the Court deems just and reasonable.

Respectfully submitted,

McBRYAN, LLC

/s/Louis G. McBryan

Louis G. McBryan, Georgia Bar No. 480993
Cecilia J. Christy, Georgia Bar No. 370092
6849 Peachtree Dunwoody Rd
Building B-3, Suite 100
Atlanta, GA 30328
Telephone (678) 733-9322
Fax (678)498-2709
lmcbryan@mcbryanlaw.com
Attorneys for Debtor